

**Testimony for Long Range Planning Committee
City of Whitefish MDOC - TSEP Grant Applications
Prepared by Scott Anderson, P.E.**

Chairman and Members of the Committee

My name is Scott Anderson. I am the Engineer for the City of Whitefish that prepared the grant application and Preliminary Engineering Report for the City of Whitefish TSEP and DNRC grant applications. I have experience in preparing several TSEP grant applications and have worked previously for the TSEP program as a contract review engineer. In the past I managed the DEQ Revolving Loan Program.

While I fully realize that economic times are difficult and that there are not sufficient state funds to support all of the TSEP grant requests, I would respectfully request reconsideration of the Whitefish project, specifically the scoring for the first statutory priority regarding public health and safety. Currently the project has received a score of "3" for this category which, as the primary and most important TSEP scoring criteria, must be considered only average.

The Whitefish project has two components with the first including the rehabilitation of several thousand feet of sewer main subject to excessive infiltration and inflow or "clear water". This work is needed to reduce excessive flow in the sewer system which taxes the capacity of the pipes, overloads the lift stations which pump the raw sewage and stresses the capacity of the treatment plant. The resulting problems include surfacing sewage, lift station failure and reduction of the treatment performance of the lagoon system. The MDEQ has taken these problems very serious and has issued an order to the City to address the deficiencies. Ten cases of raw sewage overflows were documented in the DEQ action. These overflows either spilled on the surface near the lift stations or piping systems or entered Whitefish Lake or River. Please note that this is raw sewage containing millions of pathogens. While the City has worked hard to address the mechanical problems in the system, the basic sewer piping collection system requires significant improvement. Many of the problem pipes are brittle vitrified clay pipe installed almost 100 years ago.

The other primary component of the project is to disinfect the treated wastewater which currently received no disinfection. The treated wastewater is directly discharged to the Whitefish River and the DEQ has mandated wastewater disinfection, to be functional by July 1, 2011. Many homes are located downstream of the effluent discharge and the river is used continuously in warmer weather for recreational activities. The City is presently building an access trail which is immediately adjacent to the wastewater discharge.

As I have described, we believe that this situation represents a serious public health hazard and is deserving of a higher score for the situation. The TSEP program utilizes scoring examples to help guide them in determining an appropriate score and I would like to mention two used to score a Priority "4" project, as published on their website. A

community that routinely discharges non-disinfected wastewater or inadequately treated wastewater or sludge in a location where opportunities for contact with people is likely to occur is considered level 4. The City of Whitefish, each and every day, discharges 1-2 million gallons of non-disinfected wastewater.

The second applicable level 4 scoring criteria gives an example of lift stations that fail in the near-term and affect the public's health and safety. As described in the application, several lift stations have failed in the city due to high flow events and mechanical failure. As evidenced by the DEQ Administrative Order, fines and penalties, clearly the regulatory agency considers these events as a very severe public health hazard. Raw sewage on the ground or in state waters is always construed to be a public health hazard. As cited in the order, on June 15 and 16, 2006 the main lift station which pumps virtually all of the city's wastewater overflow into the Whitefish River. The cause, as listed in the order, was excess rainfall and infiltration which exceeded the capacity of the wastewater treatment plant pump station and caused overflows. For the record, I have attached photos of other overflows which documents similar problems in the system.

In closing, I would ask the committee to consider this information as it specifically pertains to the TSEP scoring criteria and allow for a Level 4 score for the Public Health and Safety Scoring criteria.

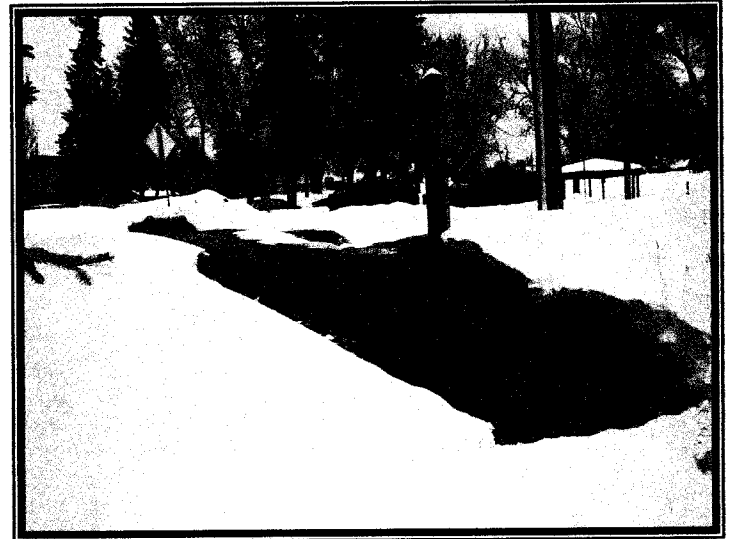
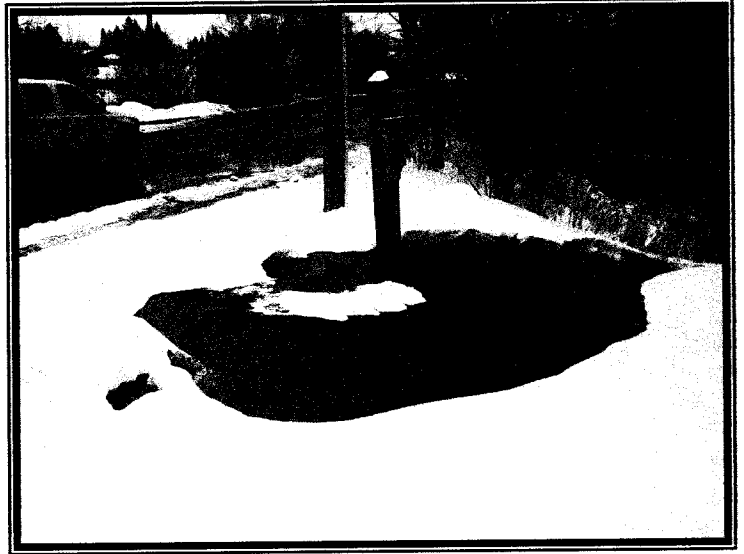
Thank you for this opportunity to testify.



January 27, 2006 SSO – on Dakota Avenue. Flowed into Whitefish Lake. Cause – obstruction in gravity sewer line.



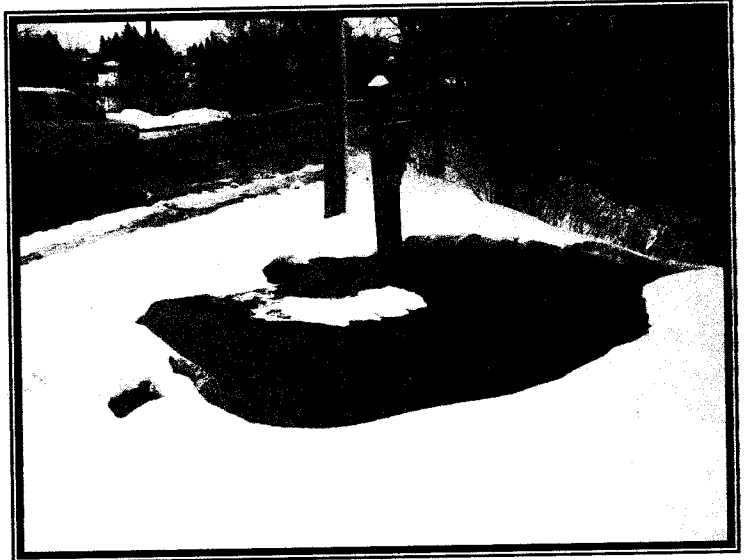
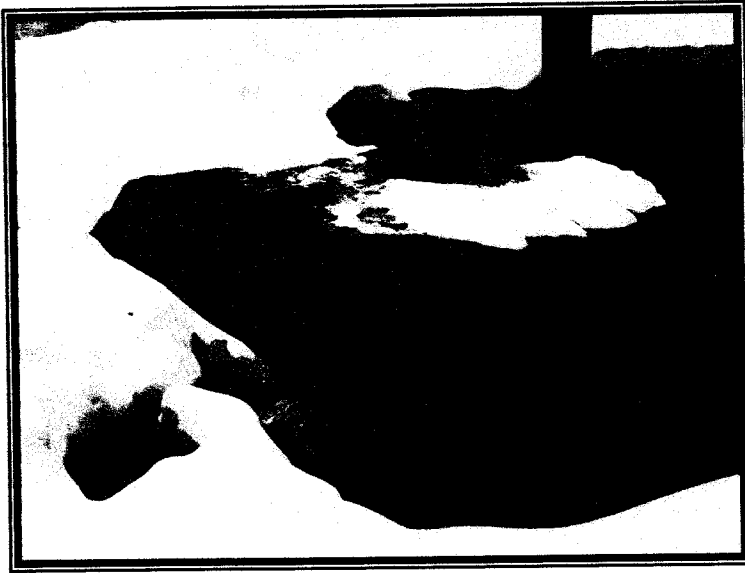
Baker Avenue Lift Station SSO – 2004. Flowed directly to the Whitefish River. Cause: obstruction in gravity sewer line.



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